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7 *Attorneys for Plaintiffs*
8 *William Frederick Durst; Limp Bizkit;*
9 *Flawless Records, LLC*

10 UNITED STATES DISTRICT COURT
11
12 CENTRAL DISTRICT OF CALIFORNIA

13 WILLIAM FREDERICK DURST, an
individual; LIMP BIZKIT; FLAWLESS
14 RECORDS, LLC, a California limited
15 liability company;

16 Plaintiffs,

17 vs.

18 UNIVERSAL MUSIC GROUP, INC., a
19 Delaware corporation; and DOES 1
20 through 20, inclusive,

21 Defendants.
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Case No. 2:24-cv-08630-PA-AJR

Hon. Percy Anderson

**JOINT STIPULATION RE STAY OF
PROCEEDINGS PENDING STATE
ACTION**

**Filed Concurrently: [PROPOSED]
ORDER**

1 Pursuant to Local Rule 7-1, Plaintiffs WILLIAM FREDERICK DURST, LIMP
2 BIZKIT, and FLAWLESS RECORDS, LLC (collectively, “Plaintiffs”) and Defendant
3 UNIVERSAL MUSIC GROUP, INC. (“Defendant”, and together with Plaintiffs, the
4 “Parties”), by and through their respective undersigned counsel, hereby STIPULATE
5 and AGREE, subject to this Court’s approval, as follows:

6 WHEREAS, on February 3, 2025, Plaintiffs filed a First Amended Complaint
7 (“FAC”) in this action, which included two federal copyright claims (the “Copyright
8 Claims”), and fourteen state law claims (the “State Law Claims”), including a state law
9 claim for rescission of certain agreements between Plaintiffs and Defendant (the
10 “Rescission Claim”);

11 WHEREAS, on February 18, 2025, Defendant filed a motion to dismiss the FAC;
12 WHEREAS, on March 18, 2025, the Court in this action issued an order denying
13 Defendant’s motion to dismiss the Copyright Claims and declining to exercise
14 supplemental jurisdiction over the State Law Claims, including the Rescission Claim,
15 and therefore denying as moot Defendant’s motion to dismiss concerning those claims;

16 WHEREAS, in light of the Court’s March 18, 2025 Order, Plaintiffs refiled their
17 fourteen state law claims, including the Rescission Claim, in Superior Court of the State
18 of California, Los Angeles County, Case Number Case No. 25STCV08378 (the “State
19 Action”);

20 WHEREAS, Plaintiffs’ Copyright Claims depend in the first instance upon the
21 adjudication of the Rescission Claim, which is currently being litigated separately in
22 the State Action;

23 WHEREAS, on May 13, 2025, the Court in this action ordered the Parties to
24 show cause as to why this action should not be stayed or administratively closed
25 pending the resolution of the Rescission Claim; and

26 WHEREAS, because the Parties are litigating the Rescission Claim separately in
27 state court, and the Copyright Claims depend in the first instance upon the outcome of
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1 the adjudication of the Rescission Claim, the Parties have agreed, in the interests of
2 judicial economy, to stay this action until the Rescission Claim has been adjudicated as
3 set forth in this Stipulation, subject to the Court's approval.

4 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AS FOLLOWS:

5 1. Stay Pending Resolution of the Rescission Claim: In light of the
6 foregoing recitals, the Parties hereby agree that this action should be stayed for all
7 purposes pending the final resolution of the Rescission Claim at the trial court level.
8 At such time as Plaintiffs' Rescission Claim is wholly resolved at the state trial court
9 level, as reflected in one or more judgments entered by a court or courts exercising
10 jurisdiction over such claim (in whole or in part), then the stay entered in this action
11 shall be automatically lifted upon Plaintiffs filing a notice of such outcome with this
12 Court, and, at such time, the Court shall promptly set a new date for the Initial
13 Scheduling Conference (without prejudice to either party seeking, by noticed motion,
14 a further stay of proceedings in this action). For the avoidance of doubt, any appeal
15 filed by Defendant relating to any judgment with respect to the Rescission Claim (or
16 any other claims in the State Action) shall not independently operate to extend the stay
17 of this action that is entered pursuant to this Stipulation, and any request for a stay
18 based upon any such appeal shall require a noticed motion.

19 2. Court Approval Required: This Stipulation only becomes effective upon
20 approval by this Court. Nothing in this Stipulation, whether approved in whole or in
21 part, shall limit this Court's power and authority to make orders concerning the matters
22 set forth therein.

23 **IT IS SO STIPULATED.**

1 Date: May 19, 2025

SEDDIGH ARBETTER LLP

2 By: /s/ Alicia M. Veglia

3 Alicia M. Veglia

4 Attorney for Plaintiffs

5 William Frederick Durst; Limp Bizkit;
and Flawless Records, LLC

6 Date: May 19, 2025

SIDLEY AUSTIN LLP

7 By: /s/ Rollin A. Ransom

8 Rollin A. Ransom

9 Attorney for Defendant

10 Universal Music Group, Inc.

11 Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the filer attests that all other signatories
12 listed, and on whose behalf this filing is submitted, concur in the filing's content and
13 have authorized the filing.
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